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THE LUBRIZOL CORPORATION  
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TELEPHONE: 713/479-2851

Certified Mail  
Return Receipt Requested

WSH 97086

October 31, 1997

Mr. Paul Lewis  
Texas Natural Resource Conservation Commission  
Corrective Action Section; Mail Code 131  
Industrial and Hazardous Waste Division  
P.O. Box 13087  
Austin, Texas 78711-3087

Subject: Preliminary Report - Unit 116 Release; Reported 7/23/97  
ISW Registration No.: 30324; EPA ID No.: TXD041067638

Dear Mr. Lewis:

As required under Title 30 Texas Administrative Code Chapter 327, Section 327.5 (c), The Lubrizol Corporation is submitting the enclosed "Preliminary Site Investigation and Remediation Activities Report." This document was prepared in response to the observation of a sheen of non-aqueous phase liquids in Patrick Bayou adjacent to Unit 116 at our Deer Park facility. In our letter to Mr. Leonard Spearman, Director of the Region 12 office of the Texas Natural Resource Conservation Commission (TNRCC), we provided notification of our intent to implement interim remedial measures, including the installation of well points immediately adjacent to Patrick Bayou. This action has been completed, and has been successful in controlling the apparent release.

Because we recently submitted an application for renewal and amendment of our existing permit and compliance plan for the Deer Park Facility (No. 50077), we are also providing copies of the report to Mr. Kan Tu and to Ms. Karen Cleveland. We are also providing courtesy copies of the report to the agencies that were originally notified and initially responded to the report of the release.

At this point, we believe that a meeting with you and your staff to review our initial findings would be appropriate. In that way, we can determine the best course of action for closure of the incident, in accordance with Title 30 TAC Chapter 335, Section 335.8 and Subpart S, "Risk Reduction Standards." I will call you to schedule this meeting. If you have any questions or need any additional information, please contact Mr. Julius Rexer at (281) 884-5284 or me at (281) 479-2851.

Sincerely,

William S. Henry  
Environmental Affairs Manager

9155441



Enclosure

**Distribution copies:**

TNRCC, Permits Section; Attn: Ms. Karen Cleveland  
Industrial and Hazardous Waste Division  
P.O. Box 13087; MC 130  
Austin, TX 78711-3087

TNRCC, Permit Section; Attn: Mr. Kan Tu  
Industrial and hazardous Waste Division  
P.O. Box 13087; MC 130  
Austin, TX 78711-3087

TNRCC, Region 12: Attn: Mr. Leonard Spearman  
5425 Polk Avenue, Suite H  
Houston, TX 77023-1423

Texas General Land Office: Attn: Ms. Rena Taylor  
11811 North D Street  
LaPorte, TX 77571

Harris County Pollution Control Department: Attn: Mr. Bob Allen  
107 North Munger  
P.O. Box 6031  
Pasadena, TX 77506

Marine Safety Office - Houston: Attn: Mr. William E. Owen  
P.O. Box 446  
Galena Park, TX 77547